

**UNITED STATES BANKRUPTCY COURT**

**FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**In Re: MICHAEL L. POL**

**CASE NO. 13-51168**

**EMERGENCY CONSENT MOTION FOR EXTENSION OF TIME TO CONTEST  
DISCHARGEABILITY OF CERTAIN DEBTS**

The Trafficking Creditors, as so designated in Doc. No. 97, Ex. A, respectfully request that the Court extend the deadline to contest Debtor Michael L. Pol's ("Debtor") dischargeability of certain debts pursuant to 11 U.S.C. § 523 for seven (7) days, from July 18, 2014 to July 25, 2014.

The Trafficking Creditors request this extension to continue discussions with Debtor's counsel regarding a possible out-of-court resolution of their dischargeability objections. Debtor consents to the extension requested.

In support of this motion, the Trafficking Creditors state as follows:

1. This Court has jurisdiction over the relief requested herein pursuant to 28 U.S.C. § 1334. This is a "core" proceeding under 28 U.S.C. § 157(b)(2).
2. Rule 4004(b) of the Fed. R. Bankr. P. provides that, "[o]n motion of any party in interest, after notice and hearing, the court may for cause extend the time to object to discharge. Except as provided in subdivision (b)(2), the motion shall be filed before the time has expired." *Id.*
3. Trafficking Creditors' counsel and Debtor's counsel are exploring a possible out-of-court resolution of the Trafficking Creditors' dischargeability objections and wish to continue discussion among counsel under the requested extension.
4. Debtor consents to this Motion and the request for an extension until July 25,

2014, of the deadline to object to the Debtor's discharge or the dischargeability of certain debts.

WHEREFORE, for the reasons set forth herein, the Trafficking Creditors respectfully request a 7-day extension (from July 18, 2014 until July 25, 2014) to object to the Debtor's discharge on the grounds set forth in 11 U.S.C. § 523.

Respectfully submitted this 17th day of July, 2014.

/s/ Daniel Werner

Daniel Werner, *pro hac vice*

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Attorneys for the Trafficking Creditors other than those represented by the Southern Poverty Law Center

**CERTIFICATE OF SERVICE**

I hereby certify that on July 17, 2014, I electronically filed the foregoing  
Emergency Consent Motion for Extension of Time to Object to Discharge and Contest  
Dischargeability of Certain Debts with the Clerk of the Court by using the CM/ECF  
system, which will send a notice of electronic filing to all CM/ECF participants. I  
further certify that I mailed the foregoing document and the notice of electronic filing by  
first class mail to non-CM/ECF participants as well as the following:

Debtor, Michael L. Pol  
Through his counsel of record  
William P. Wessler  
1624 14<sup>th</sup> Ave.  
Gulfport, MS 39502

Trustee, Kimberly R. Lentz  
2012 23<sup>rd</sup> Avenue  
Gulfport, MS 39501

U.S. Trustee  
501 East Court Street  
Suite 6-430  
Jackson, MS 39201

/s/ Daniel Werner